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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Case No. 22-11068 (JTD)

Chapter 11

(Jointly Administered)

**DECLARATION OF YUCHEN SHI
IN SUPPORT OF MOTION FOR THE ENTRY
OF AN ORDER (I) AUTHORIZING AND DIRECTING THE
DEBTORS TO RETURN CERTAIN POSTPETITION CRYPTOCURRENCY
DEPOSITS TO D1 VENTURES AND (II) GRANTING RELATED RELIEF**

I, Yuchen Shi, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I am the Managing Director of D1 Ventures Ltd. (“D1 Ventures”) and am authorized to submit this declaration on behalf of D1 Ventures. Unless otherwise noted, I have personal knowledge of the facts set forth herein.

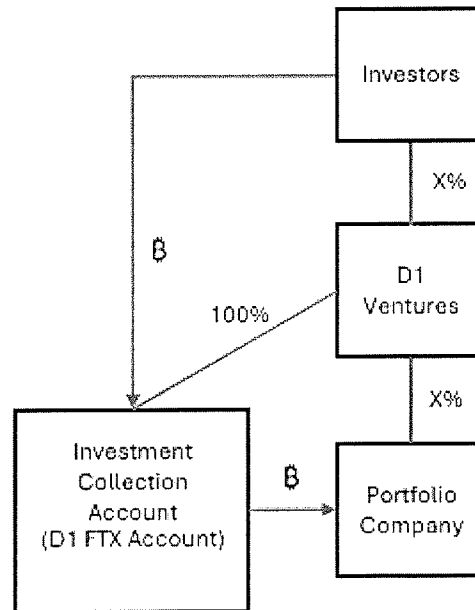
2. I am a citizen of the People’s Republic of China and reside in San Francisco, California.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. I make this declaration in support of the *Motion for the Entry of an Order (I) Authorizing and Directing the Debtors to Return Certain Prepetition Cryptocurrency Deposits to D1 Ventures and (II) Granting Related Relief* [Docket No. 1584] (the “Motion”).²

A. Relevant Corporate Background

4. D1 Ventures is a British Virgin Islands company limited by shares and located in Tortola, British Virgin Islands. D1 Ventures operates as a micro-syndicate comprised exclusively of accredited investors. Specifically, D1 Ventures syndicates digital asset investments from seven (7) accredited investors. Below is a simple graphic depicting the general process:



5. I was elevated to Managing Director of D1 Ventures in 2020. In my capacity as Managing Director, I am primarily responsible for managing D1 Ventures’ investments and overseeing general administrative duties.

² A capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

B. Creation of the D1 FTX Account

6. In or around 2021, D1 Ventures retained the services of Jasmine De Villa, a resident outside of the United States, to open an FTX account with the username singthings@outlook.com (the “D1 FTX Account”). At the time the D1 FTX Account was opened, Ms. De Villa was an agent of D1 Ventures and maintained the cryptocurrency wallet and associated FTX user account on behalf of, and at the direction of, D1 Ventures.

7. The primary purpose of the D1 FTX Account was to act as an investment collection wallet. In other words, D1 Ventures’ investors would each deposit their portion of an investment in the D1 FTX Account. At my direction, D1 Ventures would then aggregate the investments in the D1 FTX Account and forward the investments to a portfolio company. I primarily communicated with Ms. De Villa using Telegram, a popular messaging application that automatically deletes messages after a fixed period of time. As of today, all messages between me and Ms. De Villa have self-destructed.

8. Prior to the Petition Date, D1 Ventures lost communication with Ms. De Villa and ceased using the D1 FTX Account.

C. The Postpetition Deposits

9. On November 11 and November 14, 2022 (as applicable, the “Petition Date”), the Debtors commenced the above-captioned chapter 11 cases (the “Chapter 11 Cases”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

10. Upon the commencement of the Chapter 11 Cases, I immediately directed individuals under my supervision to deprecate the D1 FTX Account and change D1 Ventures’ investment collection wallet from the D1 FTX Account to an account on another platform.

11. On December 19, 2022, the D1 Ventures issued a notice to its investors instructing them to deposit their investment allocations regarding a new investment opportunity (the “Investment Notice”). The Investment Notice inadvertently identified the D1 FTX Account as the investment collection account.

12. On December 20 and 21, 2022, in accordance with the Investment Notice, certain of D1 Ventures’ investors made a series of cryptocurrency transfers, identified on Schedule 1 annexed to the Motion (collectively, the “Postpetition Deposits”), to the D1 FTX Account.

13. On December 23, 2022, I discovered the account error in the Investment Notice and attempted to reverse the transfers. However, the Debtors have prohibited their users from transferring cryptocurrency, including cryptocurrency deposited after the Petition Date, off the FTX platform.

14. On January 18, 2023, the Debtors subsequently transferred the Postpetition Deposits from the D1 FTX Account to two omnibus cryptocurrency wallets controlled by the Debtors and/or the Debtors’ professionals. The details of the subsequent transfers are set forth on Schedule 2 annexed to the Motion.

D. D1 Ventures Completes KYC Process

15. On December 16, 2024, D1 Ventures completed the extensive “know your customer” (“KYC”) process with BitGo Trust Company, Inc. using the email address operations@d1.ventures. I understand that BitGo is the institutional KYC service provider to the Debtors. Below is a message from BitGo confirming that D1 Ventures completed the KYC process:



David Chachanko

to me, Beau, Brett, bitgotrust_onboarding ▾

Hello,

I can confirm that D1 Ventures Ltd was approved at BitGo Trust Company, Inc. on December 16, 2024.

Will this confirmation suffice or were you looking for something else?



David Chachanko

Director of Trust Administration

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E. The FTX Recovery Trust Offers to Return the Postpetition Deposits

16. On February 9, 2025, representatives of the FTX Recovery Trust informed D1 Ventures (via counsel) that it is prepared to return the Postpetition Deposits, in kind, to an account of D1 Ventures' choosing, subject to completion of the KYC process.

17. However, I understand that the FTX Recovery Trust will not return the Postpetition Deposits because Ms. De Villa (rather than D1 Ventures) has not completed the KYC process.

Date: April 1, 2025
San Francisco, California

Cassandra shi (Apr 7, 2025 18:25 PDT)

Yuchen Shi